

III. REMARKS

Claims 1-25 are pending in this application. By this amendment, claims 1, 11, 14 and 20 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-4 and 6-25 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Kimball et al. (U.S. Patent Pub. No. 2004/0034646), hereinafter "Kimball," in view of Sommerer et. al. (U.S. Patent Pub. No. 2004/0003351), hereinafter "Sommerer." Applicants respectfully request withdrawal of the rejection in light of the following remarks.

The Office admits that Kimball does not disclose a history of object operations performed by the user to manage the object. Office Action, p. 3. To cure this deficiency, the Office submits that it would have been obvious to combine the teachings of Kimball with those of Sommerer which teaches a process of saving a history of web pages and providing an interface control that allows the user to customize and manage a history of interactions during a web browsing session. Office Action, p. 3. Applicants respectfully disagree that this combination, even if arguably proper, discloses each and every feature of the claimed invention.

Interpreting Sommerer only for the purposes of this response, Applicants submit that Sommerer simply teaches a process of viewing previously viewed web pages during an active

browsing session. Applicants submit that a history of previously viewed web pages is not equivalent to a history of object operations performed by the user to manage the object.

Moreover, Sommerer does not disclose "displaying a plurality of shortcuts for the object based on the user and a history of object operations performed by the user to manage the object, wherein at least one shortcut of the plurality of shortcuts comprises a control for managing data in an application" as required by amended claim 1. Instead, Sommerer's process simply stores all web pages that have been accessed in a browsing session and makes them available to the user during the duration of the session. Once the session has ended, the previously stored web pages are not available. The thumbnail images of previously viewed websites provided in Sommerer which the Office presumably equates with the "shortcuts" of the claimed invention are not used as a control to manage data in an application. They are simply provided for a user to navigate back to a web page the user has previously viewed.

In sharp contrast, in the claimed invention, the history of object operations includes object operations performed by the user to manage the object. It is not simply a storage of all previously viewed items during a session. Instead, the claimed invention stores operations performed by the user to manage the object in order to display an appropriate shortcut for that user to act as a control for data in an application. For example, in the present invention, if a user's history indicates that he/she selects cut and paste operations most frequently for an object, then buttons for those object operations will be displayed when that object is selected by the user. Therefore, in contrast to Kimball and Sommerer, in the claimed invention, a plurality of shortcuts are displayed based on the user and a history of object operations performed by the user

to manage the object, wherein at least one shortcut of the plurality of shortcuts comprises a control for managing data in an application.

Accordingly, Applicants submit that Kimball, combined with Sommerer, fails to disclose each and every element of claim 1 and respectfully request withdrawal of the rejection.

With respect to independent claims 11, 14 and 20, Applicants herein incorporate the arguments presented above with respect to claim 1. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With respect to dependent claims 2-4, 6, 8-9, 12, 13-16, 18-19, 21-22 and 24-25, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

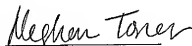
In the Office Action, claim 5 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Kimball, in view of Sommerer, in further view of Roth et. al. (U.S. Patent No. 6,266,060), hereinafter "Roth." The Office admits that Kimball, in view of Sommerer does not disclose "calculating a frequency that each object operation was selected by the user, and determining a particular object operation having the highest frequency." Office Action, p. 9. Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claim is believed to be allowable based on the above arguments, as well as for its own additional features.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,



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